



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

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100295

HAND DELIVERED

MAY 10 1993

Anne Hiller
DNREC
715 Grantham Lane
New Castle, DE 19720

Re: Standard Chlorine

Dear Ms. Hiller:

EPA has reviewed the Draft FS in more detail in conjunction with a review of the DNREC quarterly monitoring reports to for the purpose of identifying DNAPL contamination in the groundwater. Based on this review, EPA has concluded that additional information must be provided/calculated by Standard Chlorine to identify the following:

- area of known DNAPL contamination
- area of probable DNAPL contamination
- area of dissolved plume

Enclosed is a copy of the Spring 1991 Ground Water Monitoring Review article entitled "A Method for Assessing Residual NAPL Based on Organic Chemical Concentrations in Soil Samples". EPA requires that Standard Chlorine calculate the effective solubility and pore water concentration of each contaminant of concern as demonstrated in the enclosed article. The effective solubility must then be compared to the pore water concentration for each soil data point and presented in table format. Upon the evaluation of these calculations and information, EPA will be able to define the area of probable DNAPL contamination.

The DNREC groundwater quarterly reports do not provide much information regarding the observed DNAPL (for example: measured thickness, chemical & physical composition). Consequently, EPA recommends that during quarterly sampling, Standard Chlorine collect data as delineated in another enclosed article from the Fall 1992 edition of Groundwater Monitoring Review entitled "Evaluation of Visual Methods to Detect NAPL in Soil and Water". This information will provide a better picture of the DNAPL contamination.

If you have any questions, please contact me at (215) 597-0910.

AR307578

Sincerely,

Katherine A. Lose

Katherine A. Lose
Remedial Project Manager
DE/MD Section

cc: Bernice Pasquini, EPA

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